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NCBC GULFPORT
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LETTER DISCUSSING AIR FORCE PROPOSED SAMPLING AND ANALYSIS PLAN FOR
UPCOMING ENSCO TEST BURN NCBC GULFPORT MS
12/12/1989
U S EPA REGION IV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 12 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Darrell Derrington
Versar
6850 Versar Center
P.O. Box 1549
Springfield, VA 22151

Reference: United States Air Force Delisting Petition #0615

Dear Darrell:

The Agency has reviewed the Air Force's proposed sampling and analysis plan for the upcoming ENSCO incinerator test burn at NCBC as well as the proposed delisting schedule. In response to your request of Agency approval of both items, we urge you to obtain the "Petitions to Delist Hazardous Wastes: A Guidance Manual", available from NTIS (PB85-194488). This guidance should provide you with additional information on data submittal requirements for delisting petitions, including number of samples, sampling methods, QA/QC requirements, required documentation and suggested formats, etc.

In regard to the list of analyses provided in Attachment A, the Agency concurs that with the possible exception of cyanide and sulfide testing, it appears to be complete and should be adequate for the purpose of a delisting evaluation. The Agency reminds you, however, that you must demonstrate that the petitioned waste does not demonstrate the characteristics of corrosivity, ignitability, and reactivity (i.e., provide pH, flashpoint, and cyanide/sulfide results, or a statement explaining why the waste does not exhibit these characteristics). Cyanide results are required for VHS evaluation. Thus, provide Total Cyanide (SW846-9010) and EP results for cyanide using a distilled water extractant.

The required detection limits in the case of dioxin is dependent upon the level of regulatory concern at which the Agency will delist a waste. The NCBC incineration residue will be identified as EPA Hazardous Waste No. F028, which is a toxic waste rather than an acute hazardous waste. While

the Agency has suggested levels of concern for the downgrading of acutely hazardous wastes to toxic wastes in various proposals, none have been finalized to date. Further, the Agency has not promulgated a regulatory standard for dioxin which is applicable to delisting evaluations. Thus, it is not possible at this time for the Agency to provide you with a final target level for delisting. The Agency is considering using various exposure route scenarios, such as overland sediment and soil transport, and groundwater transport, in the evaluation of dioxin-related petitions. If the Agency determines that the waste is to be evaluated using the Organic Leachate Model (see 51 FR 41082-41100, November 13, 1986) and the VHS Model (see 50 FR 48886, Appendix, November 27, 1985) with a regulatory standard of 0.2 ppq, a solubility of 0.2 ppb, and a waste volume of 9,000 yd³, the maximum acceptable level for delisting of dioxin in the incinerator residue would be 0.07 ppt. The Agency may, however, determine that other exposure route scenarios are more relevant for dioxin wastes. These scenarios may result in a less conservative level of concern. The Agency recognizes that the levels set by back-calculating through exposure scenarios may result in levels of concern below the available detection limits for a solid matrix. We therefore stress the importance of achieving the lowest possible detection limits. The waste will also be evaluated for other constituents of concern and must pass the OLM/VHS analysis before a delisting can be granted.

While you will be required to conduct a TCLP analysis of the residue for dioxin in conjunction with the land disposal restriction regulation (see 51 FR 40615, November 7, 1986) a dioxin leachate level below the treatment standard will not demonstrate that the waste is nonhazardous for delisting purposes. The waste will still be subject to the OLM/VHS analysis.

With respect to your suggested delisting schedule, the Agency agrees to meet on January 16, 1987, in order for you to present the test burn results, test plan, and formal delisting petition. We are skeptical, however, about being able to provide you with adequate feedback regarding the petition within 10 days of that meeting. We will make a reasonable effort to review this data as soon as possible, however, the complexity of the review associated with a dioxin-related petition generally requires a longer review period. It should also be noted that petitions are reviewed on an "as submitted" basis, therefore it may take the Agency longer to respond depending on petition workload at that time.

In addition, your milestone chart (10/15/86) shows publication of a proposed decision at the beginning of February 1987; this milestone is definitely not reasonable. In addition to the Agency's review of the formal petition (and assuming

the petition is complete and requests for additional information are not made), a Federal Register notice proposal must be drafted, reviewed within the Delisting Program, submitted to Work Group review and Work Group comments must be addressed prior to publication in the Federal Register. While the Agency recognizes the petitioner's time requirements and will work to move the petition through the system efficiently, the review, proposal and finalization process generally takes six months after submission of a complete petition.

Please contact me if you have any further questions.

Sincerely,

A handwritten signature in cursive script that reads "Myles Morse".

Myles Morse
Acting Chief
Variances Section

cc: Alpha Bell, Region IV
Alan Antley, Region IV
Gwen Dupois, SAIC